

KAEMPFER CROWELL  
Robert McCoy, No. 9121  
Sihomara L. Graves, No. 13239  
1980 Festival Plaza Drive, Suite 650  
Las Vegas, Nevada 89135  
Telephone: (702) 792-7000  
Facsimile: (702) 796-7181  
Email: [rmccoy@kcnvlaw.com](mailto:rmccoy@kcnvlaw.com)  
Email: [sgraves@kcnvlaw.com](mailto:sgraves@kcnvlaw.com)

STEPTOE LLP  
Stephen J. Newman (*pro hac vice forthcoming*)  
Alice Kwak (*pro hac vice forthcoming*)  
2029 Century Park East, Suite 980  
Los Angeles, California 90067  
Telephone: (213) 439-9400  
Email: [snewman@steptoe.com](mailto:snewman@steptoe.com)  
Email: [akwak@steptoe.com](mailto:akwak@steptoe.com)

Attorneys for Defendant American  
Express National Bank

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

HONG SUN, an individual,  
Plaintiff,

vs.

AMERICAN EXPRESS NATIONAL  
BANK, a national banking association;  
EQUIFAX INFORMATION  
SERVICES, LLC, a foreign limited-  
liability company; EXPERIAN  
INFORMATION SOLUTIONS, INC., a  
foreign corporation; and TRANS  
UNION LLC, a foreign limited-liability  
company,

Defendants.

Case No. 2:25-cv-00049-CDS-DJA

**JOINT MOTION TO EXTEND  
DEADLINE FOR DEFENDANT  
AMERICAN EXPRESS NATIONAL  
BANK TO RESPOND  
(SECOND REQUEST)**

Plaintiff Hong Sun and defendant American Express National Bank (“American Express”) submit this joint motion to extend the deadline for American Express to respond to the complaint (ECF No. 1) for an additional 14 days, from Monday, March 10, 2025 until Monday, March 24, 2025.

This is the second extension sought in connection with this deadline and is requested to permit the parties time to investigate the allegations and assess the possibility of settlement.

LAW OFFICE OF KEVIN L.  
HERNANDEZ

KAEMPFER CROWELL

/s/ Kevin L. Hernandez

Kevin L. Hernandez, No. 12594  
8920 W. Tropicana Avenue, Suite 101  
Las Vegas, Nevada 89147

Attorneys for Plaintiff  
Hong Sun



Robert McCoy, No. 9121  
Sihomara L. Graves, No. 13239  
1980 Festival Plaza Drive, Suite 650  
Las Vegas, Nevada 89135

STEPTOE LLP  
Stephen J. Newman (*PHV forthcoming*)  
Alice Kwak (*PHV forthcoming*)  
2029 Century Park East, Suite 980  
Los Angeles, California 90067

Attorneys for Defendant American  
Express National Bank

## ORDER

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE

DATED: 3/7/2025